

Hooker, Linda

From: Valerie Bateman <valerie@newsouthlawfirm.com>
Sent: Monday, June 24, 2024 11:45 AM
To: Stricklin, Jill
Cc: Doaks, Nia
Subject: RE: J Sullivan - Will Bryant availability for depo [IMAN-WORKSITE.FID2975693]

Jill, I think I previously indicated that I have a pre-trial conference scheduled for July 8. It will be next to impossible and costly to schedule the deposition with the caveat that if the pre-trial conference is not over, I will not be able to attend because there would then be the court reporter cost, etc. I find this a less than optimal situation and would rather look to his next available date that works for everyone and jointly ask the Court to extend the discovery deadline to accommodate that date. Are you amenable to this solution? Valerie

June is Pride Month.

Support all those who follow their arrow, wherever it points.

If you are neutral in situations of injustice, you have chosen the side of the oppressor. -Desmond Tutu

"The arc of the moral universe is long, but it bends toward justice."-Theodore Parker



Valerie L. Bateman
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From: Stricklin, Jill <jstricklin@constangy.com>
Sent: Monday, June 24, 2024 9:54 AM

To: Valerie Bateman <valerie@newsouthlawfirm.com>
Cc: Doaks, Nia <ndoaks@constangy.com>
Subject: RE: J Sullivan - Will Bryant availability for depo [IMAN-WORKSITE.FID2975693]

Good morning, Valerie. Will Bryant can be available for a deposition (remotely or at UNC Health's Morrisville location) from 2:30 – 4:30 PM on Monday, July 8th. Please let us know as soon as possible if this date/time will work. This seems to be the only workable time on his calendar at this point. Thanks, Jill

Jill Stricklin

Partner - Appellate Practice Group Co-Chair

Constangy, Brooks, Smith & Prophete, LLP

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From: Stricklin, Jill

Sent: Friday, June 21, 2024 5:21 PM

To: 'Valerie Bateman' <valerie@newsouthlawfirm.com>

Cc: Doaks, Nia <ndoaks@constangy.com>

Subject: RE: J Sullivan - UNC Health's Discovery Follow up [IMAN-WORKSITE.FID2975693]

Hi Valerie,

No update yet about Will Bryant's deposition. We'll continue our efforts. Jill

Jill Stricklin

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From: Stricklin, Jill

Sent: Friday, June 21, 2024 11:58 AM

To: Valerie Bateman <valerie@newsouthlawfirm.com>

Cc: Doaks, Nia <ndoaks@constangy.com>

Subject: RE: J Sullivan - UNC Health's Discovery Follow up [IMAN-WORKSITE.FID2975693]

Hi Valerie,

Thanks for your email. Yes, we've been researching the question you raised about Paul Bednar's email as well as a few other document questions that arose during the deposition. We've retrieved the original email from Mr. Bednar – the one that was produced was a PDF of a document saved by HR. A screenshot of the full email from the review platform is

below. We'll work with our ediscovery folks on getting the document downloaded and numbered for production. I anticipate getting it to you early next week.

We've determined that Will Bryant is no longer available for deposition on June 28th, as originally offered. We're trying to determine what feasible alternatives exist. I expect to hear further on that this afternoon and will get back to you as soon as I do. (Actually, I'd hoped to hear this morning, but didn't want to delay getting this response to you while we await further word.)

As to Tracy Parham, UNC Health will not agree to make her available for deposition. There are several bases for our objections, but they primarily relate to Ms. Parham's lack of knowledge of matters related to the parties' claims and defenses, as well as proportionality and "apex doctrine" concerns given her status as a top executive.

Jill

Sourcing Director scores

From: Bednar, Paul [/O=UNC HEALTH CARE SYSTEM/OU=UNCH/CN=RECIPIENTS/CN=PBEI]
To: Rotar, Ryan [Ryan.Rotar@unchealth.unc.edu]

Hello Ryan,

Here are my Sourcing Director interview scores:

	Josh	Jack
Technical / Professional Knowledge and Skills	3.5	3.5
Decision Making	4	2
Building Partnerships	4	4
Planning and Organizing	2	3
Motivational fit	3	3

Regards,
Paul

Paul Bednar | Interim HCS Director Distribution & Logistics
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From: Valerie Bateman <valerie@newsouthlawfirm.com>

Sent: Thursday, June 20, 2024 3:54 PM

To: Stricklin, Jill <jstricklin@constangy.com>

Subject: RE: J Sullivan - UNC Health's Discovery Follow up

Jill, I wanted to follow up and ensure that you noted we would like the complete email from Paul Bednar transmitting his scores to Ryan Rotar.

I am also inquiring about Will Bryant's availability and that of Tracy Parham for deposition.

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From: Stricklin, Jill <jstricklin@constangy.com>

Sent: Tuesday, May 28, 2024 4:15 PM

To: Valerie Bateman <valerie@newsouthlawfirm.com>; June Allison <june@newsouthlawfirm.com>
Cc: Doaks, Nia <ndoaks@constangy.com>; Hooker, Linda <lhooker@constangy.com>; Canter, Rebekah <rcanter@constangy.com>
Subject: J Sullivan - UNC Health's Discovery Responses [IMAN-WORKSITE.FID2975693]

Hi Valerie and June,

Attached are Defendant's responses to plaintiff's first set of interrogatories and second requests for production in the matter involving Jack Sullivan and UNC Health.

We're in the process of preparing for production the documents referenced in the discovery responses, including Defendant's privilege log. These documents, along with a verification of the interrogatory answers, will be provided as soon as they are available.

Thanks, Jill

Jill Stricklin

Partner - Appellate Practice Group Co-Chair

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